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11 *Counsel for Defendants*

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

15 JANICE KENNY, Individually and on Behalf of  
16 All Others Similarly Situated,

X Case No.: 3:14-cv-00722 (SI)

CLASS ACTION

17 Plaintiff,

18 v.

19 MONTAGE TECHNOLOGY GROUP LIMITED,  
20 HOWARD C. YANG, STEPHEN TAI and MARK  
VOLL,

21 Defendants.

22 MARTIN GRAHAM, Individually and on Behalf of  
23 All Others Similarly Situated,

X Case No.: 5:14-cv-001893 (PSG)

CLASS ACTION

24 Plaintiff,

25 v.

26 HOWARD C. YANG, STEPHEN TAI, MARK  
27 VOLL, YUNG KUEI YU, CATHY YEN, JUNG-  
KUNG YANG, EDWARD WAY, CHARLES G.  
28 SODINI, and MONTAGE TECHNOLOGY

1 GROUP LIMITED,

2 Defendants.

5 -----X  
6 MARIA CECILIA GHILARDOTTI, Individually and on Behalf of All Others Similarly Situated,

Case No.: 3:14-cv-01894 (JD)

7 CLASS ACTION

8 Plaintiff,

9 v.

10 MONTAGE TECHNOLOGY GROUP LIMITED,  
11 HOWARD C. YANG, STEPHEN TAI, and MARK  
12 VOLL,

Defendants.

13 -----X  
14 ZHAO ERDI, Individually and on Behalf of All Others Similarly Situated,

Case No.: 4:14-cv-01895 (LLS)

15 CLASS ACTION

16 Plaintiff,

v.

17 MONTAGE TECHNOLOGY GROUP LIMITED,  
18 HOWARD C. YANG, STEPHEN TAI, MARK  
19 VOLL, YUNG KUEI YU, CATHY YEN, JUNG-  
KUNG YANG, EDWARD WAY, and CHARLES  
G. SODINI,

Defendants.

20 -----X

21 **CORRECTED STIPULATION AND PROPOSED**  
22 **CONSOLIDATION ORDER FOR**  
**SECURITIES FRAUD CLASS ACTIONS**

23 Pursuant to FRCivP 16(d), Civil L.R. 23-1(b), and Manual for Complex Litigation, Fourth  
24 §§ 11.12, 11.21 and 31 (2004), the parties stipulate, and the Court hereby orders, as follows:

# CONSOLIDATION OF RELATED CASES

1. The actions listed on Exhibit A are related cases within the meaning of Civil L.R. 3-12. Pursuant to FRCivP 42(a), these cases are hereby consolidated into Civil Action No. C-3:2014-cv-0722 for pretrial proceedings before this Court. The consolidated action shall be captioned: "In re Montage Technology Group Limited Securities Litigation."

2. All related actions that are subsequently filed in, or transferred to, this District shall be consolidated into this action for pretrial purposes. This Order shall apply to every such related action, absent order of the Court. A party that objects to such consolidation, or to any other provision of this Order, must file an application for relief from this Order within thirty (30) days after the date on which a copy of the order is mailed to the party's counsel, pursuant to Paragraph 7, infra.

3. This Order is entered without prejudice to the rights of any party to apply for severance of any claim or action, for good cause shown.

## MASTER DOCKET AND CAPTION

4. The docket in Civil Action No. C-3:2014-cv-0722 shall constitute the Master Docket for this action.

5. Every pleading filed in the consolidated action shall bear the following caption:

In re MONTAGE TECHNOLOGY  
GROUP LIMITED SECURITIES  
LITIGATION

Master File No 3:2014-cv-0722 (SI)

This Document Relates To:

6. The file in Civil Action No. C-3:2014-cv-0722 shall constitute a Master File for every action in the consolidated action. When the document being filed pertains to all actions, the phrase "All Actions" shall appear immediately after the phrase "This Document Relates To:". When a pleading applies only to some, not all, of the actions, the document shall list, immediately after the phrase "This Document Relates To:", the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action.

(e.g., "*Kenny*, No. C-3:2014-cv-0722 (SI)").

7. The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12 whenever a case that should be consolidated into this action is filed in, or transferred to, this District. If the Court determines that the case is related, the clerk shall:

- a. place a copy of this Order in the separate file for such action;
- b. serve on plaintiff's counsel in the new case a copy of this Order;
- c. direct that this Order be served upon defendants in the new case; and
- d. make the appropriate entry in the Master Docket.

## PLEADINGS AND MOTIONS

8. Defendants are not required to respond to the complaint in any action consolidated into this action, other than a consolidated complaint or a complaint designated as the operative complaint.

## DISCOVERY

9. The following definitions shall presumptively apply in all discovery issued in this action:

- a. Communication. The term "communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).
- b. Document. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in FRCivP 34(a). A draft or nonidentical copy is a separate document within the meaning of this term.
- c. Identify (with respect to persons). When referring to a person, "to identify" means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.
- d. Identify (with respect to documents). When referring to documents, "to

1           "identify" means to give, to the extent known, the (i) type of document; (ii)  
2           general subject matter; (iii) date of the document; and (iv) author(s),  
3           addressee(s) and recipient(s).

4           e. Parties. The terms "plaintiff" and "defendant" as well as a party's full or  
5           abbreviated name or a pronoun referring to a party mean the party and,  
6           where applicable, its officers, directors, employees, partners, corporate  
7           parent, subsidiaries or affiliates. This definition is not intended to impose a  
8           discovery obligation on any person who is not a party to the litigation.

9           f. Person. The term "person" is defined as any natural person or any  
10          business, legal or governmental entity or association.

11          g. Concerning. The term "concerning" means relating to, referring to,  
12          describing, evidencing or constituting.

13          10. The following rules of construction apply to all discovery requests:

14           a. All/Each. The terms "all" and "each" shall be construed as all and each.

15           b. And/Or. The connectives "and" and "or" shall be construed either  
16           disjunctively or conjunctively as necessary to bring within the scope of the  
17           discovery request all responses that might otherwise be construed to be  
18           outside of its scope.

19           c. Number. The use of the singular form of any word includes the plural and  
20           vice versa.

21          11. Counsel for the parties shall notify their clients of their document preservation  
22          obligations pursuant to the federal securities laws and the Local Rules.

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1 Dated: May 13, 2014

2 THE ROSEN LAW FIRM, P.A.

3 By:/s/ Phillip Kim

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*Counsel for Plaintiff Janice Kenny*

1  
2 THE FOREGOING STIPULATION  
3 IS APPROVED AND IS SO ORDERED.  
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Dated: May 12, 2014



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Hon. Susan Illston  
UNITED STATES DISTRICT JUDGE

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## **ATTESTATION OF FILING**

Pursuant to Local Rule 5-1(i)(3) regarding signatures, I, Phillip Kim, hereby attest that concurrence in the filing of this Stipulation and Proposed Consolidation Order for Securities Fraud Class Actions has been obtained from each of the other Signatories with conformed signatures above.

Dated: May 13, 2014

By:/s/ Phillip Kim

Phillip Kim

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1 EXHIBIT A

2 RELATED CASES

3 • *Graham v. Yang, et al*, Case No. 5:14-cv001893

4 • *Ghilardotti v. Montage Technology Group Limited, et al*, Case No. 3:14-cv-01894

5 • *Erdi v. Montage Technology Group Limited, et al*, Case No. 4:14-cv-01895

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